



**DLA IMPAC  
ACTIVITY/ORGANIZATION  
PROGRAM  
COORDINATOR (AOPC)  
TRAINING**



**These slides provide an overview of the DLA Purchase Card Program for AOPCs and provide useful templates that may be used as part of Activity training provided to Cardholders and Billing Officials. All personnel with Purchase Card responsibilities should be familiar with DLA 4105.2**



# IT ALL STARTS HERE!



**LAWS, EXECUTIVE ORDERS,  
FEDERAL ACQUISITION REGULATIONS  
GOVERN PURCHASE CARD USAGE**



# FEDERAL ACQUISITION REGULATION (FAR)

The **FAR** is the primary regulation for use in acquisition of supplies and services with appropriated funds.

**DLAI 4105.3** provides DLA'S FAR implementing guidance on purchase card usage. Can be found on the web at

<http://www.dlans.hq.dla.mil/>



# DOD PURCHASE CARD PROGRAM

GSA Contract GS23F98002 is the Contract between the Federal Government and USBank that “establishes” the card program. DOD issued a Task Order under the GSA contract to implement DOD’s purchase card program. The purchase card utilized by DLA and all DOD (except Navy) is the USBank IMPAC Card



# POCs

- DLA Agency Program Coordinator (APC)
  - William Latimer
    - **Phone 703-767-3154-- (DSN) 427-3154**
    - **william\_latimer@hq.dla.mil**
- DOD Program Management Office
  - [www.purchasecard.saalt.army.mil](http://www.purchasecard.saalt.army.mil)
  - DLA representative at PMO is Ms. Meloc Stoddard, 703-681-0371.



# POLICY OVERVIEW

## • PURCHASING

- THE PURCHASE CARD IS THE MANDATORY PURCHASE AND/OR PAYMENT INSTRUMENT FOR ALL MICROPURCHASES ( $\leq$  \$2500;  $\leq$  \$2000 for construction)
  - DLA HAS DEPSECDEF WAIVER FROM MANDATORY USAGE FOR WHOLESALE STOCKFUND PURCHASES
  - **SEE DLAI 4105.3 FOR ADDITIONAL WAIVER AND USAGE POLICY.**
- PURCHASE CARD ALSO MANDATORY PAYMENT INSTRUMENT FOR ALL DD FORM 1556 TRAINING REQUESTS UP TO \$25,000
- USE OF THE PURCHASE CARD **DOES NOT NEGATE** THE APPLICABILITY OF ACQUISITION REGULATIONS
  - FAR PART 8 MANDATORY SOURCES STILL APPLY



# **FUNDING OVERVIEW**

- **PRIMARY FUNDING POLICY IS CONTAINED IN DEPSECDEF MEMORANDUM #3 - CHANGE 1 (AVAILABLE AT [WWW.PURCHASECARD.SAALT.ARMY.MIL](http://WWW.PURCHASECARD.SAALT.ARMY.MIL))**
- **HIGHLIGHTS ARE:**
  - **ADVANCE RESERVATION OF FUNDS SHALL BE USED IN CONJUNCTION WITH ALL PURCHASES MADE USING CARDS**
    - **SHALL BE “BULK FUNDED”**
  - **SINGLE LINE OF ACCOUNTING PER CARD**
    - **DOD ACTIVITIES SHALL “ROLL UP” DISBURSING DATA BY LOA**
  - **A TRAINED CERTIFYING OFFICER SHALL RECEIVE, APPROVE, AND OFFICIALLY CERTIFY PAYMENT OF EACH PURCHASE CARD BILLING STATEMENT**





# IMPAC



[www.purchasecard.saalt.army.mil](http://www.purchasecard.saalt.army.mil)



**Q: What is different about the I.M.P.A.C. card versus a “personal” VISA card?**

**A. It's not a “credit card”, it's a purchase (monthly balances must be paid in full). See DLAI 4105.3 for “disputed” transactions.**



# TRAINING

- In accordance with the DLA Instruction 4105.3: potential cardholders and billing officials are required to be trained by the AOPC prior to assumption of responsibilities.
- Additional training information is also available thru USBank at: [www.usbank.com/impac/train\\_mktg\\_materials](http://www.usbank.com/impac/train_mktg_materials). Contact USBank to obtain a<sub>11</sub> password to access this specific site



# PURCHASE CARD AUTHORITY

The **Authorizing Official** (Head of the Contracting Activity or authorized designee) delegates authority to use the credit card to pay for Government supplies and services. This is done in writing and will contain the cardholder's single purchase limit and purchasing restrictions.

**Every cardholder and billing official must have an Appointment letter (see DLAI 4105.3, Enclosures 1 and 2 for format).**



# ACCOUNT INFORMATION

- The Purchase Card program follows a hierarchical structure
  - **Level One** - Federal Government: 47163
  - **Level Two** - Department Of Defense: 00097
  - **Level Three** - DLA: 00051
  - **Level Four** - Activity: 4-digit number assigned by USBank. A/OPCS are Level 4.
  - **Level 5** - Billing Official
  - **Level 6** - Cardholder



# USING THE I.M.P.A.C. CARD

- **“OVER-THE-COUNTER”**
- **TELEPHONE ORDERS**
- **MAINTAIN PURCHASE LOGS/KEEP PURCHASE “BACK-UP”**
- **DON’T PUT CREDIT CARD NUMBER ON WRITTEN ORDER DOCUMENTS**
- **GOVERNMENT DOES NOT PAY SALES TAX**



# AUTHORIZED USE

- Single item or multiple items with total not exceeding authorized single purchase limit
- Generally, items must be available at time of purchase for over-the counter purchases and phone orders (deviation requires billing official approval)
- **DO NOT SPLIT** requirement to keep from exceeding the \$2,500.00 limit per purchase



# UNAUTHORIZED USE

- Cash Advances
- Rental/lease of vehicles in conjunction with TDY travel
- Airline, bus, train or other travel related tickets
- Meals, drinks, lodging, or other travel or subsistence cost
- Hazardous material (unless authorized by and procured IAW activity HAZMAT pharmacy and HAZMAT manager's procedures.
- Rental or lease of land or buildings, except short term conference or meeting rooms.





# UNAUTHORIZED USE (continued)

- **Repair of interagency fleet management vehicles in the GSA Fleet Management Program.**
- **Telecommunications services such as FTS 2000 or DSN (unless coordinated with the Activities communications OPR)**
- **Information technology equipment not Y2K compliant.**
- **CPG items that don't meet recycled content guidelines (unless a waiver is first obtained as identified in the DLA CPG guidance).**
- **Recurring services that are split in order to stay within micro-purchase thresholds.**

**NOTE: Activities may place restrictions or conditions on purchase card usage that are in addition to those specified in the DLAI as necessary to meet mission needs. A/OPCs should identify those to cardholders/billing officials.**



# CARDHOLDER DOCUMENTATION & RECORD KEEPING

- Purchasing Log
  - Example shown in DLAI 4105.3,

## Enclosure 3

- Purchase Request or similar documentation required by Activity Policy
- Sales Slip/Receipt/Delivery Ticket
- Credit Documentation [returned item/delivery]



# **AOPC RESPONSIBILITIES**

**• COMPLETE ACTIVITY RESPONSIBILITY FOR  
ACTIVITIES CARD PROGRAM**

**- PROVIDES/RESPONSIBLE FOR  
CARDHOLDER & BILLING OFFICIAL  
TRAINING**

**- AUDITS ACCOUNTS -- ENSURES  
INTEGRITY**

**- DEVELOPS ACTIVITY PURCHASE CARD  
POLICY**

**- LIAISON WITH DLA AGENCY PROGRAM  
COORDINATOR (APC) AND USBANK ON  
ACCOUNT MANAGEMENT ISSUES**



## **CARDHOLDER RESPONSIBILITIES**

- **ONLY PERSON AUTHORIZED TO USE THEIR PURCHASE CARD**
- **MAINTAINS RECORDS OF PURCHASES TO INCLUDE RECEIPTS, DELIVERY TICKETS**
- **VERIFIES RECEIPT (I.E., DELIVERY/ACCEPTABILITY) OF ITEMS**
- **RECEIVES MONTHLY CARDHOLDER STATEMENT OF ACCOUNT (SOA), DATE STAMPS STATEMENT UPON RECEIPT**
- **RECONCILES SOA, VERIFYING CHARGES/ CREDITS; COMPLETES ANY REQUIRED BLANKS; SUBMITS CARDHOLDER STATEMENT OF QUESTIONED ITEM FORM AS NECESSARY**
- **FORWARDS RECONCILED AND SIGNED SOA WITH SUPPORTING PURCHASE BACK-UP TO BILLING OFFICIAL WITHIN 5 DAYS OF RECEIPT**



# **BILLING OFFICIAL RESPONSIBILITIES**

- **CERTIFIES BILLING STATEMENT**
  - **REVIEWS FOR UNAUTHORIZED PURCHASES**
  - **ENSURES MANDATORY SOURCES COMPLIANCE**
  - **ENSURES VENDOR “ROTATION”**
  - **ENSURES CARDHOLDER PROVIDES ADEQUATE BACK-UP DOCUMENTATION WITH SOA**
- **NOTIFIES AOPC OF CARDHOLDER CHANGES**
- **MONITORS PAYMENT DELINQUENCIES.**



## WHAT IS THE CUSTOMER AUTOMATION AND REPORTING ENVIRONMENT (C.A.R.E)?

- **ON-LINE USBANK DATABASE THAT ALLOWS AUTHORIZED USERS TO VIEW ASSIGNED CARD ACCOUNT INFORMATION**
  - **SECURE WEB-SITE**
  - **PASSWORD PROTECTED; PASSWORDS OBTAINED THRU USBANK**
  - **LIMITS ACCOUNT ACCESSIBILITY TO THOSE WITH PROPER AUTHORIZATION (I.E. "NEED-TO-KNOW")**
  - **ALLOWS ON-LINE ACCOUNT SET UP AND CHANGES**
  - **ALLOWS STANDARD & AD-HOC REPORTS VIEWING**
  - **UPCOMING IMPROVEMENTS INCLUDE ON-LINE BILLING STATEMENT CERTIFICATION**



# **BILLING OFFICIAL OR CARDHOLDER ACCOUNT SET- UP**

- **COMPLETION OF REQUIRED TRAINING**
- **COMPLETE REQUIRED FORMS FOR SUBMISSION TO USBANK**
  - **“CARDHOLDER SETUP” FORM**
  - **“BILLING OFFICIAL SETUP” FORM**
  - **“POINT OF CONTACT SETUP” FORM**
  - **“C.A.R.E. PROGRAM ADMINISTRATOR SETUP AND MAINTENANCE” FORM**
- **REQUIRED FORMS ALSO MAY BE COMPLETED VIA USBANK CUSTOMER AUTOMATION AND REPORTING ENVIRONMENT (C.A.R.E.)**
- **CARDHOLDERS AND BILLING OFFICIAL SHALL BE APPOINTED VIA PROCEDURES IDENTIFIED IN DLAI 4105.3 E.1.e.**



# **BILLING OFFICIAL & CARDHOLDER ACCOUNT MAINTENANCE**

- “BILLING OFFICIAL MAINTENANCE” FORM
- “CARDHOLDER MAINTENANCE” FORM
- EXAMPLES OF MAINTENANCE
  - **SINGLE PURCHASE LIMIT CHANGE**
  - **90 DAY OFFICE SPENDING LIMIT CHANGE**
  - **CANCELLED CARD(S)**
  - **ADDRESS CHANGE**
- CAN ALSO BE PERFORMED IN C.A.R.E.





# COMMODITY PURCHASING

- [AOPC's should insert a slide here to specify their Activity's Purchase Request submission requirements to cardholders for commodity purchases]
  - Items to consider include any requisite approval/coordination requirements, product description submission, specification of required delivery date, delivery destination, etc.
- ENSURE CARDHOLDERS VERIFY RECEIPT OF ITEMS ORDERED AND KEEP VERIFYING BACK-UP PAPERWORK!!



# SERVICES

- [APC's should tailor this slide to include Activity specific requirements that must be accomplished prior to purchase].
  - Items to consider should include PWS/SOW submission requirements, coordinated Purchase Request or other document as required by the Activity, period of performance identification, suggested vendor, etc.



# **FAR PART 8**

## **MANDATORY SOURCES**

- **PRIORITY OF USAGE - SUPPLIES**
  - 1) AGENCY INVENTORIES**
  - 2) EXCESS FROM OTHER AGENCIES**
  - 3) FEDERAL PRISON INDUSTRIES (UNICOR)**
  - 4) PRODUCTS FROM THE COMMITTEE FOR PURCHASE FROM PEOPLE WHO ARE BLIND OR SEVERELY DISABLED(NIB/NISH - SKILCRAFT)**
  - 5) WHOLESALE SUPPLY SOURCES**
  - 6) MANDATORY FEDERAL SUPPLY SCHEDULES**
  - 7) OPTIONAL USE FEDERAL SUPPLY SCHEDULES**
  - 8) COMMERCIAL SOURCES**



# **FAR PART 8**

## **MANDATORY SOURCES**

- **PRIORITY OF USAGE - SERVICES**
  - 1) **PRODUCTS FROM THE COMMITTEE FOR PURCHASE FROM PEOPLE WHO ARE BLIND OR SEVERELY DISABLED (NIB/NISH - SKILCRAFT)**
  - 2) **MANDATORY FEDERAL SUPPLY SCHEDULES**
  - 3) **OPTIONAL USE FEDERAL SUPPLY SCHEDULES**
  - 4) **FEDERAL PRISON INDUSTRIES (UNICOR) OR**

# PURCHASE CARDHOLDER'S GUIDE TO THE JAVITS-WAGNER-O'DAY (JWOD) PROGRAM (PRODUCTS & SERVICES THROUGH NIB/NISH)

- A quality source of supply...
- A mandatory source for all Federal agencies...
- A unique employment program for Americans who are blind or who have other severe disabilities.



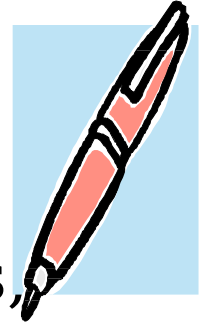
# JWOD Introduction

- Purpose: Create Jobs for People Who Are Blind or Have Other Severe Disabilities
  - 14 Million+ Americans Have Severe Disabilities
    - Unemployment Above 65% for This Population
    - Need Assistance to Obtain & Maintain Employment
- Method:
  - Federal Agencies Buy Certain Supplies and Services Furnished by Nonprofit Agencies Employing Such Individuals



# JWOD Products & Services

- Office Supplies, Commonly Used Items
  - Writing Instruments, Paper Clips, Folders, Stationery, Desk Accessories, Day Planners, Plastic Bags, Shipping Boxes



- Cleaning Products, Industrial Items
- Medical/Surgical Items, Textiles



- Services
  - Temporary Administrative Services and More

# How Do I Buy JWOD Items?

- It's Easy!
  - Next-Day Delivery Available for Office Supplies
  - Product & Ordering Info is On-line or in Print Catalogs
    - **By Phone or Fax:** GSA's Customer Supply Center  
Tel. 800-525-8027 or Fax 800-856-7057
    - **By Internet:** *GSA Advantage!* at [www.fss.gsa.gov](http://www.fss.gsa.gov), or the DLA E-Mail at [www.emall.dla.gov](http://www.emall.dla.gov)
    - **From Authorized Commercial Distributors:**  
Visit [www.jwod.gov](http://www.jwod.gov) For Complete List
    - **At Military Base Supply Centers or SERVMARTs**



# New Procurement Rules?

- Is JWOD Still Mandatory If I Only Buy Small Amounts With My Purchase Card?
  - YES!
  - There Are **No Waivers** to the Requirement to Buy JWOD Program Supplies and Services. This Requirement Applies at Any Dollar Amount.
    - No Exemptions for Micro-purchases, Simplified Acquisition Purchases, or “Off-the-Shelf” Purchases.



# Need More JWOD Information?

- Points of Contact:
  - **Committee Staff (Government oversight)**  
Eric Beale, (703) 603-7743, ebeale@jwod.gov
  - **National Industries for the Blind (NIB)**  
Customer Service, (800) 433-2304,  
CustomerService@nib.org
  - **NISH (serving a wide range of disabilities)**  
Rachel Loock, (703) 207-7581, rloock@nish.org



# UNICOR

- Federal Prison Industries (UNICOR)
  - Waivers Issued by UNICOR -- waiver is required prior to “open market” purchase of an item that is available thru UNICOR
  - UNICOR Items can be found through:
    - **UNICOR Web Site**  
(<http://www.unicor.gov>)
    - **UNICOR Catalog**
    - **GSA Supply Catalog**



# UNICOR Product Lines

(examples)

Office Furniture, Chairs,  
System Furniture

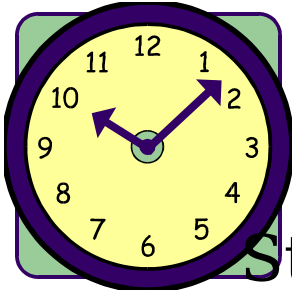


Remanufactured Toner Cartridges

Bedding

Clothing

Gloves



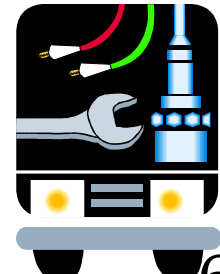
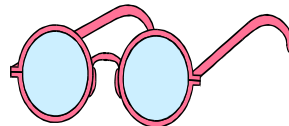
Steel Storage Equipment & Industrial  
Products



Electronics

Optics

Data Conversion Services  
Labor & Support Services





# COMPREHENSIVE PROCUREMENT GUIDELINES

**•NOTE TO ACTIVITY/ORGANIZATION PROGRAM COORDINATORS (LEVEL 4s): THE FEDERAL GOVERNMENT IS REQUIRED BY VARIOUS REGULATIONS AND EXECUTIVE ORDERS TO PURCHASE “ENVIRONMENTALLY FRIENDLY PRODUCTS” -- PURCHASE CARD CARDHOLDERS ARE NOT EXEMPTED FROM THIS REQUIREMENT. SEE THE SLIDES AT THE END FOR INFORMATION PUT TOGETHER BY DLA HQ ENVIRONMENTAL ADDRESSING THIS AREA AND INCORPORATE INTO YOUR CARDHOLDER/BILLING OFFICIAL TRAINING AS REQUIRED.**



# CARD SECURITY

- It is the cardholder's responsibility to safe the purchase card and account number at a times.
- The cardholder shall not allow anyone to u his/her card or account number.
- Immediately report all suspected fraudulen
- A violation of this trust will require that th card be withdrawn from the cardholder with the possibility of subsequent disciplinary ac
- It is recommended that cards be safeguarded the same manner as cash.



# Government Liability for Credit Card Charges

- When charges are made by authorized IMPAC cardholders, the Government is liable for payment of those charges under the Master GSA Agreement.
- If you suspect that a cardholder is making unauthorized charges, you should report the matter in accordance with ethics and fraud regulations.

[NOTE: THIS SLIDE HAS ACCOMPANYING NOTES. CLICK "VIEW", "NOTES PAGE" TO SEE THEM]



# Fraud Involving Non-Employees

- If you notice that charges have been made against the card which the cardholder did not authorize, report this immediately to [INSERT YOUR POC].
- The credit card company will need information to validate any claims that the cardholder did not authorize the charges.
- Coordinate the matter with your office of counsel. Do not assume that the credit card company will handle the investigation.





# **INTERNAL SECURITY** **CONTROLS**

- **A/OPCS MUST ESTABLISH INTERNAL CONTROLS FOR CARDHOLDERS/BILLING OFFICIALS. THESE SHOULD INCLUDE:**
  - **INTERNAL REVIEWS PER DLAI 4105.3, E.4.e.**
  - **CONDUCTING PERIODIC REVIEWS OF THE CONTINUING NEED FOR EACH CARDHOLDER TO MAINTAIN AN IMPAC CARD (PER DLAI 4105.3, E.3.b.(7)(d). ALSO, CONSIDER ROTATING CARDHOLDERS.**
  - **USING C.A.R.E. TO MONITOR UNUSUAL PURCHASING ACTIVITY.**
  - **CARDHOLDERS & BILLING OFFICIALS SHALL NEVER BE THE SAME INDIVIDUAL.**



# **INTERNAL SECURITY**

## **CONTROLS**

### **(cont'd)**

- **PERIODIC “SPOT” INSPECTIONS OF BILLING OFFICIAL AND CARDHOLDER RECORDS. LOOK FOR “WARNING SIGNS”:**
  - PURCHASES OUTSIDE OF THE NORMAL OFFICE “PROFILE”.
  - RECURRING PURCHASES FROM SAME VENDOR.
  - LACK OF DELIVERY VERIFICATION.
  - ACCOUNTABLE PROPERTY NOT LOGGED.
- **TRAINING ON HOW TO REPORT SUSPECTED CARD ABUSE (SEE DLAI 4105.3, E.4. FOR LOST/STOLEN CARD PROCEDURES).**



# Reporting Ethics Violations

- **Employees MUST report actual or suspected ethics violations**
- **Suspected violations must be reported to any of the following:**
  - agency designee
  - suspected violator's agency designee
  - Commander
  - Ethics Counselors
  - DoD Inspector General (IG)
  - Defense Criminal Investigative Service (DCIS)
  - DoD Hotline

[NOTE: THIS SLIDE HAS ACCOMPANYING NOTES. CLICK "VIEW", "NOTES PAGE" TO THEM]





# Reporting Fraud Matters

- **Employees MUST report actual or suspected instances of fraud**
- **Suspected violations must be reported to any of the following:**
  - Activity Fraud Counsel (INSERT NAME)
  - Activity Program Attorney
  - Supervisors
  - Commander's Complaint Program
  - DoD Inspector General (IG)
  - Defense Criminal Investigative Service (DCIS)
  - DoD Hotline
- **Employees MUST also contact USBank (1-888-994-6722)**

[NOTE: THIS SLIDE HAS ACCOMPANYING NOTES. CLICK "VIEW", "NOTES PAGE" TO SEE THEM]



# **SURVEILLANCE PROGRAM “TOOLS”**

- AOPC Reports from USBank
- USBank C.A.R.E. System
- Purchase Requests
- Cardholder’s Purchase Log
- Sales receipts, Other Vendor Documentation
- Cardholder’s Monthly Statement
- Billing/Certifying Official’s Billing Statement
- ORGANIZATIONAL RECORDS MUST BE  
RETAINED FOR AUDIT PURPOSES



# MONTHLY RECONCILIATION

- **CARDHOLDER**
  - **Receives Cardholder Monthly Statement of Account (SOA).**
- **BILLING/CERTIFYING OFFICIAL**
  - **Receives “Official” Billing Statement (consolidated accounting of all assigned cardholders). Certification and submission of this statement to DFAS authorizes payment to USBank.**
  - **Also receives monthly reports allowing account management.**



# **RECONCILIATION (continued)**

- **BILLING/CERTIFYING OFFICIAL**

- **RECEIVES MONTHLY OFFICIAL BILL (TEN (10) DAYS FROM THE CYCLE DATE).**

- **IF NOT RECEIVED BY FIFTEENTH (15TH), CONTACT BANK FOR FAX COPY**

- **DATE STAMP BILL (ACTS AS OFFICIAL DATE FOR PROMPT PAYMENT ACT)**

- **VERIFIES ACCURACY BY COMPARING AGAINST ASSIGNED CARDHOLDERS SOAs; FILLS IN REQUIRED BLANKS, SIGNS, WRITES IN: WORK PHONE NUMBER; ACCOUNTING INFORMATION AS REQUIRED**

- **FORWARD TO DEAS WITH IN THREE (3) DAYS**



# IMPAC PAYMENTS

- **MUST BE TRACKED**

- Non Payment of Account

  - **BILLING OFFICIAL RESPONSIBLE FOR ALL LATE PAYMENTS -- MUST inquire to DFAS as to why payment has not been made.**

  - **Payment delinquencies unacceptable! Accounts with outstanding balances beyond 60 days will be suspended.**

- **Mail Invoices To:**  
**DFAS-CO-LCOAC**  
**ATTN: Cheryl Filkins**  
**P.O. Box 369016**  
**Columbus, OH 43216-9016**

- Follow-up La**  
**Payments:**  
**Phone: (614) 6**  
**Fax: (614) 69**  
**DSN: 869<sub>48</sub>**





# CARDHOLDER SEPARATION

- CARDHOLDER
  - Cuts card in half and surrenders to Billing/Approving Official
  - Cancel cardholder account in sufficient time to ensure last statement clears prior to their release
  - Billing/Approving official completes Cardholder Maintenance Form and forwards to A/OPC for processing



# **BILLING OFFICIAL SEPARATION**

◆ **The Billing Official is Accountable for their Program until they are released from those duties.**

**-Billing Officials should be changed in sufficient time to allow their final Billing Statement to be received, certified, and submitted to DFAS for payment prior to their departure.**

**-Ensure all account delinquency matters have been resolved **prior** to their departure**



# **IMPAC CHECK POLICY**





# CHECK CONTROL

- Maximum One Check Account per DLA Activity at Each Installation
- Quarterly Audit's Mandatory
- Tool of "Last Resort" -- Maximize Search to Find Vendors Who Accept IMPAC Card
- Activities Must Hold an Active (Good Standing) IMPAC Account Prior to Applying for Check Account



# CHECK CONTROL (cont'd)

- Commander/Director Must Approve Check Account Setup
- Maximum Value Allowed Per Check \$2,500 (\$10K for O.S. Contingencies)
- Check Accounts Shall be Bulk Funded
- **See DLAI 4105.3, E.1.j. and Financial Management Regulation, Vol 5, Chap 2 for Complete Check Account Requirements**



# FOREIGN DRAFTS

- **“CHECK” INSTRUMENT FOR USE OVERSEAS ONLY (CURRENTLY AVAILABLE IN 26 COUNTRIES).**
- **USED ONLY WHEN NO VENDOR CAN BE FOUND THAT ACCEPTS IMPAC CARD OR IMPAC CONVENIENCE CHECKS.**
- **DISTINCT FROM IMPAC CONVENIENCE CHECKS**
  - **ISSUED IN FOREIGN CURRENCY.**
  - **REQUIRES SPECIFIC USBANK SOFTWARE TO DRAFT, APPROVE, AND PRINT THE DRAFT.**
  - **REQUIRES DAILY ELECTRONIC REPORTING TO USBANK.**
  - **HOST COUNTRY LAWS APPLY TO VENDOR DISPUTES.**



Remember

- [www.dlaps.hq.dla.mil/dlai/i4105.3.htm](http://www.dlaps.hq.dla.mil/dlai/i4105.3.htm)

- [DLAI 4105.3](#)

- <http://purchasecard.saalt.army.mil/>

- [Purchase Card PMO](#)

- [www.usbank.com/impac/purchase.html](http://www.usbank.com/impac/purchase.html)

Remember

- [william\\_latimer@hq.dla.mil](mailto:william_latimer@hq.dla.mil);

# DLA CPG POLICY ISSUED BY ENVIRONMENTAL AND SAFETY POLICY

11/03/99 12:16 FAX 703 787 8093

CAAE

002



IN REPLY  
REFER TO

CAAE

**DEFENSE LOGISTICS AGENCY**  
HEADQUARTERS  
8725 JOHN J. KINGMAN ROAD, SUITE 2533  
FT. BELVOIR, VIRGINIA 22060-6221

**JUL 24 1999**

MEMORANDUM FOR COMMANDERS, DLA PRIMARY LEVEL FIELD ACTIVITIES

SUBJECT: DLA Guidance for Affirmative Procurement of Comprehensive Procurement Guideline (CPG) Items

The Resource Recovery and Conservation Act (RCRA), Section 6002, and Executive Order (E.O.) 12873, "Federal Acquisition, Recycling, and Waste Prevention", directs the Federal government to purchase EPA designated items that contain recycled-content material. Attached is DLA guidance on implementing these requirements.

The DLA guidance will be of assistance to individuals who have procurement or acquisition authority for items consumed for facility operations and maintenance, including IMPACT card users, and contracting and item management personnel who procure items for our customers. This guidance identifies the EPA Comprehensive Procurement Guideline Items, and provides instructions for recording keeping and annual reporting of DLA CPG procurements

Additional hard copies and discs are available. Contact Ms. Nancy Royal-Jones, CAAE, if there are questions on implementing this guidance. Ms. Royal-Jones can be contacted at (703) 767-6256, or DSN 427-6256.

A handwritten signature in black ink, appearing to read "Jan B. Reitman".

JAN B. REITMAN  
Staff Director  
Environmental and Safety Policy

Attachments





# Affirmative Procurement Program

- **What is it?**
- **Who is responsible for implementation?**
- **Definitions**
- **Driving Regulatory Requirements.**
- **Benefits & “Closing the circle.”**



# **Affirmative Procurement Program**

- **Products Designated by EPA.**
- **Records, Reporting Requirements and Waivers.**
- **Points of Contact and Web Sites.**



# Affirmative Procurement

- **Affirmative Procurement** is the purchasing of the EPA-designated recovered materials and environmentally preferable products to the maximum extent practicable consistent with the Federal procurement law. This also includes biobased products.



# Who is responsible?

- All personnel using appropriated funds are required to purchase products and /or services for the Federal Government. IMPAC users are included in this requirement.



# Definitions

- **A recycled product** is made in whole or in part from a material recovered from the waste stream:
  - recycled paper
  - remanufactured laser toner cartridge
  - recycled plastic containers
- **Environmentally preferable** means products or services that have *“a lesser effect on human health and the environment when compared with competing products or services that serve the same purpose”*.



# BIOBASED PRODUCTS

- **BIOBASED**: *“a commercial or industrial product (other than food or feed) that utilizes biological products or renewable domestic agricultural (plant, animal, and marine or forestry material).”*
  - biodegradable (inks, trash bags, etc.)
  - compostable (plastic cutlery)
  - recyclable (oils, biobased fuels, etc.)



# Regulatory

## Requirements

- **Recourse Conservation & Recovery Act** (RCRA), Section 6002.
- **DOD Instruction 4715.4**- “Pollution Prevention”.
- **Executive Order 13101** - “GREENING THE GOVERNMENT THROUGH WASTE PREVENTION, RECYCLING, AND FEDERAL ACQUISITION”, Dated 14 Sept 1998.
- **Executive Order 13134** - “Developing and Promoting Biobased Products and Bioenergy”, Dated 12 Aug 1999
- **DLA-I 4105.3**- DLA- Government-wide Commercial Purchase Care Program.



# Benefits

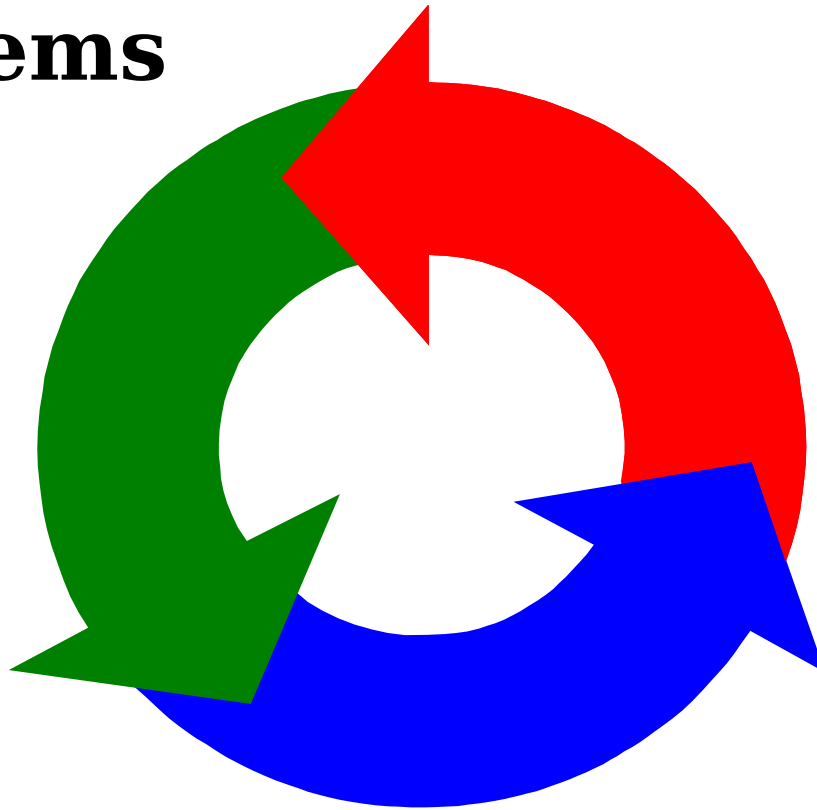
- **Conserves natural resources**, “Sustainable America.”
- **Reduces solid waste** - land fill diversion.
- **Lowers energy, water & raw materials cost** used in manufacture of new materials.
- **Reduces release** of pollutants from manufacture.
- **Reduces impacts** of mining, harvesting, extraction.
- **It is the “law”!** Helps your agency meet reporting requirements under RCRA. 64





# CLOSING THE CIRCLE

- **Recycling, Reuse, and Buying CPG items**





# Comprehensive Procurement Guide(CPG) Recovered Materials Advisory Notice (RMAN)

- **CPG Products:**

- 7 categories and 36 items. 18 more items under consideration by EPA.
- Bio-based product purchasing is also required.

- **RMAN- Designated levels set by EPA for recycled content material mandatory for each CPG item.**

- Recycled paper is now at 30% recycled content ( if not available no less than 20%)



# Comprehensive Procurement Guide Line Items

- **Paper and Paper Products**

- Commercial/industrial sanitary tissue products
- Miscellaneous papers
- Newsprint
- Paperboard and packaging products
- Printing and writing papers

- **Vehicular Products**

- Engine Coolants,
- Lubricating Oils Containing Re-Refined Oil
- Retread Tires



# Comprehensive Procurement Guide Line Items

- **Non-Paper Office Products**
  - Binders (paper, plastic covered)
  - Office Recycling Containers
  - Office Waste Receptacles
  - Plastic Desk Accessories, Plastic Envelopes, Plastic Trash Bags
  - Printer Ribbons, Toner Cartridges



# Comprehensive Procurement Guide Line Items

- **Transportation Products**

- Channelizers
- Delineators
- Flexible Delineators
- Parking Stops
- Traffic Barricades
- Traffic Cones

- **Park and Recreation  
Products**

- Plastic Fencing
- Playground Surfaces
- Running Tracks



# Comprehensive Procurement Guide Line Items

- **Landscaping Products**

- Garden and Soaker Hoses
- Hydraulic Mulch
- Lawn and Garden Edging
- Yard Trimming Compost

- **Miscellaneous Products :**

- Pallets



# Comprehensive Procurement Guide Line Items

## • **Construction Products**

- Building Insulation
- Polyester Carpet
  - Cement and Concrete Containing:
  - Coal Fly Ash & Ground Granulated Blast Furnace Slag
- Consolidated and Reprocessed Latex Paint
- Floor Tiles
- Patio Blocks
- Shower and Restroom Dividers and Partitions
- Structural Fiberboard & Laminated Paperboard



# Purchasers' Record Keeping Requirements

- **Documentation:** Mandatory requirement to assist your agency in meeting reporting requirements to the Office of the Federal Environmental Executive.
- **AOPC sends reports by (April 1st & October 29th)**  
to their installation Environmental Coordinator.  
(listing provided)
- **Waivers must be granted to procure items designated on CGP list that do not contain recovered materials. AOPC approves the waivers.**
  - Files on waivers must be maintained for inspection review .





# WAIVER REQUIREMENTS

- **Non-Purchasing of CPG and environmentally preferable products is only allowed when:**
  - the product is not readily available (for meeting deadline in contract services).
  - product does not meet performance standards
  - product not available at a reasonable cost
    - Life cycle cost must be considered.
- **Waivers must be submitted to your IMPAC program manager and approved.**
  - Keep waiver on file



# WAIVER CRITERIA

**Requests for waivers must state:**

- **What product you want to purchase**
- **Why you cannot purchase the CPG item or environmentally preferable product(justify).**
- **Consider Life-Cycle Costs, not just initial cost of a product**
  - Initial cost + handling + disposal =  
Life-cycle Cost



# Purchase LOG

- **Check mark in designated products block.**
- **Check Yes or No if it meets or exceeds the RMAN level.**
- **Date of Waiver, if checked “No” for RMAN levels.**
- **Annotate price of product purchased.**
- **Calculate total price of each category. Annotate total price of products purchased for each category in the “total price block”**



# Purchase Log Sample

DESIGNATED PRODUCTS BY EPA (WWW.EPA.GOV/CPG)	EPA SUGGESTED RMAN LEVELS	RMAN - MEETS OR EXCEEDS LEVEL			NO RECYCLED CONTENT WAIVER DATE	PURCHASE PRICE
		YES	NO	What is %		
<b>PAPER PRODUCTS</b>						
Commercial/industrial sanitary tissue products	20 to 100%					
Miscellaneous papers	30%					
Newsprint	20 to 100%					
Paperboard and packaging products	25 to 100%					
Printing and writing papers (if not available not less than 20%)	30%					
Total Price						



# Purchasing Products

- **Automated Milstrip or Fedstrip system**
- **Environmental Coordinators List provided for AOPCs to send reports.**
- **[www.supply.dla.mil](http://www.supply.dla.mil)**
- **GSA MUFFIN System**
  - **1-800-352-2852**



# Information & References

- [www.caae.hq.dla.mil](http://www.caae.hq.dla.mil)
  - **DSN: 427-6256**: hard copy of the **DLA Affirmative Procurement Guide**
- [www.epa.GOV/CPG/](http://www.epa.GOV/CPG/)
- [www.ofee.gov/](http://www.ofee.gov/)
- **EPA Information**
  - **Phone: 1-800-424-9346**
  - **reference document**
    - **EPA530-R-98-006**



# SUMMARY

- **IMPAC** - Purchasers are required to **purchase and report** on current and future EPA designated CPG items, and environmentally preferred products.
- **Log purchases for EPA inspections, and to meet biannual reporting requirements to the AOPC.**
  - AOPC forwards reports to your Environmental Coordinator every six months.